

REMARKS

This Application has been carefully reviewed in light of the Office Action mailed May 26, 2006 (the "Office Action"). Claims 1-5, 9, 10, 14-18, 22, 23 and 27-31 are pending in the application. The Examiner rejects Claims 1-5, 9, 10, 14-18, 22, 23 and 27-31. To advance prosecution of this case, Applicant amends Claims 1, 9, 14, 22, 29, and 31. Applicant does not admit that any amendments are necessary due to any prior art or any of the Examiner's rejections. Applicant respectfully requests reconsideration and allowance of all pending claims.

Section 103 Rejections

The Examiner rejects Claims 1-5, 9-10, 14-18, 22-23 and 27-31 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,356,892 B1 issued to Corn, et al. ("*Corn*"), in view of U.S. Patent No. 6,112,198 issued to Lohman, et al. ("*Lohman*"), and in view of U.S. Patent No. 5,412,804 issued to Krishna, ("*Krishna*"). Applicant respectfully traverses this rejection and requests reconsideration and allowance of Claims 1-5, 9-10, 14-18, 22-23 and 27-31.

The *Corn-Lohman* combination fails to support the rejection for at least three reasons. First, the *Corn-Lohman* combination fails to teach, suggest, or disclose "determining a plurality of results associated with the sum of terms, wherein the determination comprises...collecting, into a first list, results associated with the one or more negative terms...and collecting, into a second list, results associated with the one or more positive terms while omitting from the second list any results that are in the first list" as recited in amended Claim 1. Second, the cited references fail to teach, suggest, or disclose "expanding each term to remove NOT operators" as recited, in part, in Claim 2. Third, the cited references fail to teach, suggest, or disclose a method wherein, "if the service query comprises a term having at least two NOT operators, deleting or disregarding from the sum of terms a third-order term corresponding to the term having at least two NOT operators" as recited in amended Claim 29.

First, the *Corn-Lohman* combination fails to teach, suggest, or disclose "determining a plurality of results associated with the sum of terms, wherein the determination comprises...collecting, into a first list, results associated with the one or more negative terms...and collecting, into a second list, results associated with the one or more positive

terms while omitting from the second list any results that are in the first list” as recited in amended Claim 1. The cited references describe various methods for processing database queries. In particular, *Corn* describes a method for translating an LDAP filter-based query to an SQL subquery. (*Corn*; abstract; col. 3, ll. 1-41). *Lohman* describes a method for parallel processing of subtasks associated with a query. (*Lohman*; abstract; col. 1, ll. 42-59). Finally, *Krishna* describes a method for un-nesting nested query blocks. (*Krishna*; abstract; col. 3, ll. 19-41). None of these references teach, suggest, or disclose “collecting, into a first list, results associated with the one or more negative terms” as recited in amended Claim 1. In addition, none of the cited references teach, suggest, or disclose “collecting, into a second list, results associated with the one or more positive terms” as recited in amended Claim 1. The cited references also fail to teach, suggest, or disclose “omitting from the second list any results that are in the first list” as recited in amended Claim 1. Because the cited references fail to teach, suggest, or disclose these aspects of amended Claim 1, the cited references do not support the rejection. For at least this reason, Applicant respectfully requests reconsideration and allowance of amended Claim 1.

Second, the cited references fail to teach, suggest, or disclose “expanding each term to remove NOT operators” as recited, in part, in Claim 2. The Examiner relies on *Corn* for this aspect of Claim 2. *Corn* teaches a method for re-writing LDAP queries as SQL subqueries. (*Corn*; Abstract). The cited portion of *Corn* describes re-writing an LDAP logical operator NOT to an SQL logical operator NOT IN. (*Corn*; col. 8, ll. 40-51). Specifically, the cited portion of *Corn* states:

If a pair of LDAP filter elements are subject to an LDAP logical NOT operator, the corresponding EID sets are merged using an SQL NOT IN logical operator.

(*Corn*; col. 7, ll. 50-52). Thus, *Corn* teaches re-writing a query term comprising a NOT operator as an SQL term comprising a NOT IN logical operator. Simply re-writing a query term to comprise a NOT IN operator does not teach, suggest, or disclose removing “NOT operators” as recited in Claim 2. Thus, the cited portion of *Corn* does not support the rejection of Claim 2. If the Examiner is supplementing his interpretation of *Corn* with personal knowledge, Applicant respectfully requests that the Examiner provide an affidavit that documents the personal knowledge upon which he is relying. Otherwise, Applicant respectfully requests that the Examiner withdraw the rejection of Claim 2.

Third, the cited references fail to teach, suggest, or disclose a method wherein, “if the service query comprises a term having at least two NOT operators, deleting or disregarding from the sum of terms a third-order term corresponding to the term having at least two NOT operators” as recited in amended Claim 29. In the Office Action, the Examiner cites *Corn* with respect to this aspect of amended Claim 29. The cited portion of *Corn* states:

If the LDAP logical operator is NOT, the invention preferably excludes entries by negating the IN operation before the subquery. Thus, the combination rules includes, for example, mapping the LDAP logical OR operation to an SQL UNION, mapping the LDAP logical operation AND to SQL INTERCEPT, and mapping the LDAP logical operation NOT to SQL NOT IN.

(*Corn*; col. 3, ll. 14-20). This portion of *Corn* merely teaches mapping the LDAP operator NOT to the SQL operator NOT IN. The cited portion of *Corn* makes no mention of “a third-order term” or of “a term having at least two NOT operators” as recited in amended Claim 29. In addition, the cited portion of *Corn* clearly fails to teach, suggest, or disclose “deleting or disregarding from the sum of terms a third-order term corresponding to the term having at least two NOT operators” as recited in amended Claim 29. It appears that the Examiner is relying on something more than the express teachings of *Corn* to reject Claim 29. If the Examiner is relying on personal knowledge, Applicant respectfully requests that the Examiner provide an affidavit that documents the knowledge on which he is relying. Because the cited references fail to teach, suggest, or disclose the foregoing aspects of amended Claim 29, Applicant respectfully requests reconsideration and allowance of amended Claim 29.

In rejecting Claims 9, 14, and 22 the Examiner employs the same rationale used with respect to Claim 1. Accordingly, for at least the reasons stated above with respect to amended Claim 1, Applicant respectfully requests reconsideration and allowance of amended Claims 9, 14, and 22.

Applicant herein amends Claim 31 to be an independent claim. For at least the reasons stated above with respect to amended Claims 1, 2, and 29, Applicant respectfully requests reconsideration and allowance of amended Claim 31.

Claims 3-5, 10, 15-18, 23, 27-28, and 30 depend from independent claims shown above to be allowable. In addition, these claims recite further elements not taught, suggested, or disclosed by the cited references. For at least these reasons, Applicant respectfully requests reconsideration and allowance of Claims 3-5, 10, 15-18, 23, 27-38, and 30.

CONCLUSION


Applicant has made an earnest attempt to place this case in condition for allowance. For the foregoing reasons and for other reasons clearly apparent, Applicant respectfully requests reconsideration and full allowance of all pending claims.

If there are matters that can be discussed by telephone to further the prosecution of this Application, Applicant invites the Examiner to call the undersigned attorney at (214) 953-6755 at the Examiner's convenience.

Although no fees are believed due for this response, the Commissioner is hereby authorized to charge any fees or credit any overpayments to Deposit Account No. 02-0384 of Baker Botts L.L.P.

Respectfully submitted,

BAKER BOTTS L.L.P.
Attorneys for Applicant

A handwritten signature in black ink, appearing to read "Justin Stewart", written in a cursive style.

Justin N. Stewart
Reg. No. 56,449

Date: August 25, 2006

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